

**SEALED**

**UNITED STATES DISTRICT COURT**  
for the  
Northern District of Texas

**FILED****May 5, 2021**KAREN MITCHELL  
CLERK, U.S. DISTRICT COURT

United States of America	)	
v.	)	
MICHAEL WILMER WILSON	)	Case No.
	)	3:21-MJ-412-BN
	)	
	)	
	)	

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

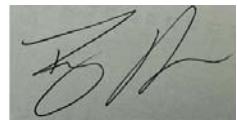
On or about the date(s) of February 9, 2021 in the county of Dallas in the  
Northern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2113(a)	Bank Robbery

This criminal complaint is based on these facts:

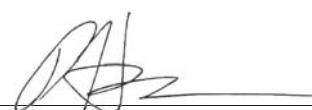
see attached affidavit in support of criminal complaint.

Continued on the attached sheet.


*Complainant's signature*Randall White, Special Agent*Printed name and title*

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: 5/5/2021


*Judge's signature*

City and state: Dallas, Texas

DAVID L. HORAN, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR CRIMINAL COMPLAINT**

I, Randall K. White, a Special Agent with the Federal Bureau of Investigation (“FBI”), being first duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the FBI and have been since January 2011.

During my training and since that time, I have received formal training from the FBI as well as training through contact with experts from various law enforcement agencies regarding bank robbery investigations, Hobbs Act robberies, and other violent crime related offenses. As a result of my training and experience, I am familiar with violations of federal laws pertaining to bank robbery and those who aid and abet robbers of commercial institutions in their criminal activity. Through my training and experience, I am familiar with techniques used to investigate such crimes. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. In preparation for this affidavit, I have discussed the facts of this case with other law enforcement agents and officers. The information contained in this affidavit is based on my personal knowledge, information I received from other law enforcement agents and officers assisting in this investigation, witnesses, and what I have learned from the other sources specifically discussed herein. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning this investigation.

3. This affidavit sets forth facts establishing probable cause to believe that on or about February 9, 2021, in the Dallas Division of the Northern District of Texas and elsewhere, Michael Wilmer **WILSON** committed the offense of bank robbery, in violation of 18 U.S.C. § 2113(a).

### **PROBABLE CAUSE**

#### **I. February 9, 2021 Robbery of Bank OZK, Dallas, Texas**

4. On February 9, 2021, at approximately 2:18 p.m., at Bank OZK<sup>1</sup>, located at 2821 Ft. Worth Ave., Dallas, Texas, in the Northern District of Texas, a Black male wearing a dark cloth face mask, a black hoodie, black pants, an orange reflective vest, and an orange reflective hat, entered the bank. He approached the victim teller at the counter and requested a deposit slip. The victim teller gave the suspect a deposit slip, which the suspect took and pretended to fill out in the lobby. A short time later, the suspect approached the victim teller and produced a demand note from a manila-style folder that said, “This is a robbery. I have a gun.” The teller gave the suspect \$2,352 in cash, the suspect placed the cash in an accordion-style folder, the suspect left the deposit slip on the teller counter, and the suspect fled the bank on foot. The suspect was not apprehended.

5. The robbery was captured on bank surveillance footage, screenshots of which are depicted below:

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<sup>1</sup> On the date of this robbery, the deposits of Bank OZK were insured by the Federal Deposit Insurance Corporation.



6. Dallas Police Department detectives responded to the bank and collected the deposit slip left by the suspect. The deposit slip was processed by Dallas Police Department for latent prints, and a print was collected. The print from the deposit slip was provided to the Dallas Police Department for entry into the Automated Fingerprint Identification System (“AFIS”), which compares known fingerprints against a database of fingerprints. The AFIS search returned no matches.

## **II. April 20, 2021 Robbery of Affiliated Bank, Bedford, Texas**

7. On April 20, 2021, at approximately 12:12 p.m., at Affiliated Bank, located at 500 Harwood Road, Bedford, Texas 76021, in the Northern District of Texas, a Black male wearing dark pants, a red t-shirt with “Applebee’s” printed on it, a dark hat with “Applebee’s” printed on it, and a dark colored face mask entered the bank holding a large manila envelope. The suspect approached a teller window and asked for a withdrawal slip from the teller. The suspect then displayed a handwritten demand note to

the victim teller that contained the words “ARMED” and “ROBBERY.” The victim teller, who was in fear for her life, provided the suspect with \$1,200 in cash. The suspect placed the cash into the manila envelope and fled the bank on foot. The suspect was observed getting into the driver’s seat of a silver two-door Dodge Challenger and driving away. The suspect was not apprehended.

8. The robbery was captured on bank surveillance footage, screenshots of which are depicted below:



9. Video surveillance footage from April 20, 2021 was collected from L.D. Bell High School, 1601 Brown Trail, Hurst, Texas, which is located approximately 0.8 miles from Affiliated Bank. In the footage, a silver two-door Dodge Challenger can be seen at approximately 12:13 p.m. driving south on Brown Trail, away from Affiliated Bank. A screenshot of the surveillance footage is depicted below:



### III. April 29, 2021 Robbery of Ennis State Bank, Ennis, Texas

10. On April 29, 2021, at approximately 1:20 p.m., at Ennis State Bank, located at 815 West Ennis Avenue, Ennis, Texas 75119, in the Northern District of Texas, a Black male wearing dark shorts, a black long sleeved button up shirt, a tan colored fisherman's hat with a draw string, black sneakers, and a blue surgical mask entered the bank holding a brown folder. The suspect approached a teller window then displayed a handwritten demand note to the victim teller that read, "THIS IS A ROBBERY. 30K. DON'T BE A HERO." The victim teller, who was in fear for her life, provided the suspect with \$10,186 in cash. The suspect had the victim teller place the cash directly into the folder and fled the bank on foot. After he fled the bank, the suspect was observed walking behind a fence that separates the bank from the rear of an adjacent H.E.B. grocery store. The suspect was not apprehended.

11. The robbery was captured on bank surveillance footage, screenshots of which are depicted below:



12. FBI agents collected video surveillance footage from April 29, 2021 from the H.E.B. grocery store located at 101 South Clay Street, Ennis, Texas 75119, which is adjacent to Ennis State Bank. In that footage, a silver two-door Dodge Challenger can be seen at approximately 1:23 p.m. pulling out from behind the H.E.B. grocery store and driving directly across the street from Ennis State Bank into the parking lot of Norteno's Mexican Food, located at 814 West Ennis Avenue, Ennis, Texas. Approximately three minutes later, a marked Ennis Police Department vehicle can be seen on the footage arriving at the bank, at which point the Dodge Challenger can be seen pulling out of the Norteno's Mexican Food parking lot and driving eastbound on Ennis Avenue. An image from the H.E.B. grocery store surveillance footage is depicted below:



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13. Another marked Ennis Police Department vehicle reported to Ennis State Bank in response to the robbery, and while traveling to the bank, the patrol vehicle unknowingly crossed paths with the Dodge Challenger, as the Dodge Challenger was stopped at a stop light on Ennis Avenue. The dash camera of this patrol vehicle recorded the license plate of the Dodge Challenger as Texas license plate number PBC9739. Further, the dash camera footage depicts a Black male in the driver's seat of the Dodge Challenger with his elbow out of the open window.

#### **IV. Identification of Michael Wilmer WILSON**

14. A search of Texas Department of Motor Vehicles records revealed that the vehicle identification number ("VIN") for the Dodge Challenger described above is 2C3CDYAG2DH599727.

15. The records further showed that the Dodge Challenger is registered to Michael Wilmer **WILSON**, date of birth August 7, 1986 and Texas driver's license

number 45673240. **WILSON** has an address of 6050 Melody Lane, Apartment 172, Dallas, Texas 75231, listed on his driver's license. **WILSON** meets the physical description of the suspect in the bank robberies listed above. Below is **WILSON's** driver's license photograph, taken on March 10, 2020:



16. On May 3, 2021, FBI agents received fingerprints for **WILSON** from the Texas Department of Public Safety that had been collected by the Texas Department of Motor Vehicles on March 10, 2020 when **WILSON** applied for and received his Texas driver's license.

17. On May 4, 2021, **WILSON's** driver's license fingerprints were provided to the Dallas Police Department AFIS Unit for comparison against the fingerprint collected from the deposit slip left by the suspect at the February 9, 2021 bank robbery detailed above.

18. Dallas Police Department forensic fingerprint examiner, Jennifer McCampbell, examined the prints and reported that the print collected from the deposit

slip left by the suspect at the February 9, 2021 bank robbery was identified as the left thumb print associated with Texas driver's license number 45673240 – **WILSON's** Texas driver's license number.

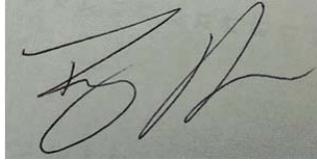
**CONCLUSION**

19. Based on the facts set forth above, there is probable cause to believe that on or about February 9, 2021, in the Dallas Division of the Northern District of Texas, Michael Wilmer **WILSON**, knowingly and intentionally committed bank robbery, in violation of 18 U.S.C. § 2113(a), at Bank OZK, 2821 Ft. Worth Ave., Dallas, Texas.

[No further information on this page.]

**REQUEST FOR SEALING**

20. I respectfully request that the Court order that all papers in support of this application, including the affidavit, complaint, and arrest warrant, be sealed pending arrest of **WILSON**. These documents discuss an ongoing criminal investigation, of which the details thereof are neither public nor known in their entirety to **WILSON**. Accordingly, there is good cause to seal these documents because their premature disclosure may give **WILSON** an opportunity to flee from prosecution, destroy or tamper with evidence, change patterns of behavior, notify confederates, or otherwise jeopardize the investigation. I further request that these documents be immediately unsealed following the arrest of **WILSON**.



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Randall K. White  
Special Agent  
Federal Bureau of Investigations

Agent sworn and signature confirmed via reliable electronic means on May 5, 2021, pursuant to Fed. R. Crim. P. 4.1.



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HONORABLE DAVID L. HORAN  
United States Magistrate Judge  
Northern District of Texas